

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP
ATTORNEYS AT LAW

1300 MOUNT KEMBLE AVENUE
P.O. BOX 2075
MORRISTOWN, NEW JERSEY 07962-2075
(973) 993-8100
FACSIMILE (973) 425-0161

THOMAS R. CURTIN
Direct Dial: (973) 401-7117
tcurtin@mdmc-law.com

November 23, 2020

VIA ECF

Hon. Michael A. Shipp, U.S.D.J.
Clarkson S. Fisher Federal Building
and U.S. Courthouse, Room 5000
402 E. State Street
Trenton, New Jersey 08608

Re: *UMG Recordings, Inc. et al. v. RCN Telecom Services, LLC et al.*
Civil Action No. 19-17272 (MAS) (ZNQ)

Dear Judge Shipp:

This firm, along with our co-counsel Jenner & Block LLP and Stein Mitchell Beato & Missner LLP, represents Plaintiffs/Counterclaim Defendants (“Plaintiffs”) and Counterclaim Defendant Recording Industry Association of America, Inc. (“RIAA”) in the referenced matter. We write to request a one-week extension of time for Plaintiffs and RIAA to file reply papers in further support of their pending Motion to Dismiss Counterclaims (ECF No. 122), from December 14, 2020 to December 21, 2020.

Plaintiffs and RIAA filed their Motion to Dismiss Counterclaims on November 6, 2020, with a motion return date of December 7, 2020. On November 12, 2020, Defendants filed a letter pursuant to Local Civil Rule 7.1(d)(5) adjourning the motion to the next motion date on December 21, 2020. The adjournment extended Defendants’ time to file opposition to the motion for two weeks, from November 23, 2020 to December 7, 2020, giving them over four weeks since the filing of our motion to prepare opposition papers.

Plaintiffs and RIAA’s reply papers are currently due December 14, 2020. Defendants have consented to a one-week extension of that due date. We respectfully request the Court’s approval of that extension.

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

Hon. Michael A. Shipp, U.S.D.J.
November 23, 2020
Page 2

We have included a “So Ordered” provision at the end of this letter in the hope that this extension is acceptable to the Court.

Respectfully yours,


McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

s/ Thomas R. Curtin

THOMAS R. CURTIN

cc: All Counsel (via ECF and e-mail)

SO ORDERED this 24th day of November, 2020.



HON. MICHAEL A. SHIPP
United States District Judge